



THE FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: The Commission

FROM: *Gilbert Ford*
Gilbert Ford
Acting Chief Financial Officer

SUBJECT: Corrective Action Plan (CAP) for Data Act Audit

DATE: November 29, 2018

The Office of Inspector General (OIG) conducted an audit that focused on Data Act within the FEC.

Attached please find an updated Corrective Action Plan that includes the findings and the status of the findings as of November 2018. The OCFO will continue to work with the OIG on closing the remaining CAP items.

If you have any questions, please feel free to contact me. Thank you.

cc: Inspector General

Gena's Notes 11/14/18	Recommendation Title	Actual Issue Date	Recommendation	Managment Response	Planned Corrective Actions	Estimated Implementation Date	Last Status Update	Revised Implementation Date	Recommendation Age	Owner	OIG Follow-up
Project Name: Data Act Audit											
<p>OIG will consider closing this action. Provided copy of FY19 IAA w/ FSSP. Reviewed the section on DATA Act Services.</p> <p>Corrective Action will remain open. Opportunity to close in the next review scheduled to begin in Jan/Feb 2019</p> <p>Corrective Action will remain open. Opportunity to close in the next review scheduled to begin in Jan/Feb 2019. OIG mentioned previous Procurement Audit CAP and inquired whether procurement management is regularly reviewing FPDS entry. Gena to discuss w Sheri and Pam the process of reviewing the monthly D1 (need supporting documentation detailing Pam's review or acknowledgment of the monthly DATA Act team review)</p>	<u>The SAO should ensure adequate control procedures are implemented</u>	11/30/2017	The SAO should ensure adequate control procedures are implemented to ensure data files are complete, accurate, timely, reconciled, and properly linked.	Agree	1. Update Quarterly Submission Procedures 2. Obtain FSSP Assurance to provide corrections and re-submissions of corrected files. 3. Monthly Review of the D1 File	6/1/2019	The DATA Act quarterly reconciliation and certification procedures have been updated. Also, File D1 is now reviewed monthly to identify and correct any errors prior to the submission. The SAO reviews the reconciliation spreadsheet and meets with the DATA Act program group to discuss data issues identified prior to certifying the DATA files in the Broker.		117	Gena Braveboy	The OIG reviewed the updated reconciliation and certification procedures and they appear adequate to satisfy DATA Act requirements related to ensuring data files are complete, accurate, and of quality. OIG confirmed that File D1 is also reviewed monthly to identify and correct errors timely. However, there are still some data quality and recurring data linkage issues. The OIG was informed that some of these issues require corrective actions by the FSSP. Although, FEC management continues to work with the FSSP to resolve data issues, the FSSP will not guarantee that data will be corrected or DATA files will be resubmitted to the Broker. OIG notes that until corrective actions have been fully implemented to ensure accurate DATA Files are submitted to the Broker, this recommendation can not be closed.
	<u>The FEC should work with FSSP to resolve data transmission issues</u>	11/30/2017	The FEC DATA Act PMO and Senior Accountable Official (SAO) should work with the FSSP to ensure appropriate corrective actions are implemented to ensure all future DATA Act submissions are submitted on time and the files are complete	Agree	Obtain FSSP Assurance to provide corrections and re-submissions of corrected files. Implement monthly review of the D1 File	6/1/2019	All DATA files are being submitted to the Broker on time. However, there are still some accuracy and quality issues identified with some of the DATA files, but they are not always corrected by the FSSP and the FSSP will not commit to resubmit files. FEC management continues to work with the FSSP to resolve data issues.		117	Gena Braveboy	OIG notes that until these data issues can be resolved, this recommendation can not be closed.
	<u>Non-financial data elements should be verified</u>	11/30/2017	The SAO should ensure that proper controls are in place to ensure all non-financial data related to standard data elements are entered into the procurement system correctly.	Agree	1. Provide Refresher Training for Staff 2. Update Procurement Procedures	6/1/2019	Procurement is reviewing policies and procedures and is in the process of retraining and reeducating program offices in how to initiate an enter award data into Comprizon. Also, DATA Act program staff is reviewing File D1 monthly to identify any issues prior to the quarterly submission.		117	Gena Braveboy	Procurement is reviewing policies and procedures and is in the process of retraining and reeducating program offices in how to initiate an enter award data into Comprizon. Also, DATA Act program staff is reviewing File D1 monthly to identify any issues prior to the quarterly submission. This recommendation can not be closed enter the OIG can verify that the process is operating effectively.